# EXHIBIT C

1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA
.3	SAN FRANCISCO DIVISION
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6	ORACLE AMERICA, INC., )
7	Plaintiff, )
8	vs. ) No. CV 10-03561 WHA
9	GOOGLE, INC.,
10	Defendant. )
11	)
12	
13	
14	HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
15	
16	VIDEOTAPED DEPOSITION OF JOHN ROSE
17	WEDNESDAY, FEBRUARY 15, 2012
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25	PAGES 1 - 111
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7	Videotaned Denogition of TOUN POSE taken on
	Videotaped Deposition of JOHN ROSE, taken on
8	behalf of Defendant, at Morrison & Foerster, 755 Page
9	Mill Road, Palo Alto, California, commencing at
10	9:47 a.m., Wednesday, February 15, 2012, before Sandra
11	Lee Hockin, CSR 7372.
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    APPEARANCE OF COUNSEL:
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    FOR PLAINTIFF ORACLE AMERICA, INC.:
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5
          BOIES, SCHILLER & FLEXNER, LLP
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          BY:
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    FOR DEFENDANT GOOGLE, INC.:
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          San Francisco, California 94111-1809
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21
    Also present:
22
          Adam Del Rio, Videographer
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24
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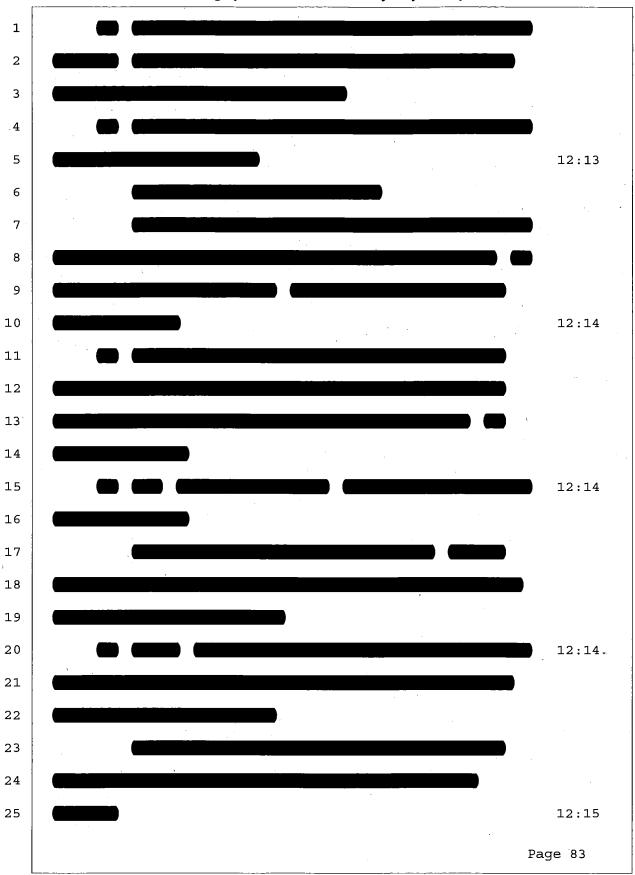
1	JOHN ROSE,
2	after having been duly sworn, testified as follows:
3	
4	THE VIDEO OPERATOR: Good morning. My name
5	is Adam Del Rio of Veritext National Deposition and 09:43
6	Litigation Services. Today's date is Wednesday,
7	February 15, 2012. The approximate time is 9:47 a.m.
8	This deposition is being held at the office
9	of Morrison & Foerster located at 755 Page Mill Road
10	in Palo Alto, California. The caption of the case is 09:44
11	Oracle America, Incorporated versus Google,
12	Incorporated, being held in the United States District
13	Court for the Northern District of California. The
14	name of the witness today is John Rose.
15	At this time, will attorneys identify 09:44
16	themselves for the record and the parties they
17	represent, beginning with the questioning attorney,
18	please.
19	MR. MULLEN: Reid Mullen, Keker & Van Nest
20	for the defendant Google. 09:44.
21	MR. NORTON: Fred Norton, Boies Schiller &
22	Flexner for plaintiff Oracle America.
23	THE VIDEO OPERATOR: Thank you. Will the
24	court reporter, Sandy Hockin, please administer the
25	oath and we may proceed. 09:45
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1	(Oath administered by the court reporter.)	
2	MR. NORTON: So a housekeeping matter,	
3	pursuant to the Court's order, we're producing some	
4	documents this morning in both this deposition and in	
5	Dr. Reinhold's. And so I'm going to hand you some	09:45
6	stacks of documents. One is a spreadsheet, and I have	
7	three Redwells, which are identical. I'll hand you	
8	one. I have an extra copy for the court reporter, and	
9	I'll just hold my copy. You can use them, of course,	
10	as you see fit, but rather than being forced to hand	09:45
11	things across the table tome, I'll hold on to my set.	
12	And, for the moment, I'll put the court reporter's set	
13	in front of you.	
14	MR. MULLEN: Okay.	
15	MR. NORTON: And then also, pursuant to the	09:45
16	court's order, documents that the engineers used in	-
17	providing information to Dr. Reinhold, these are all	
18	documents that were previously produced in the case;	
19	but because they were used, we brought another copy of	
20	them to the deposition here today.	09:46.
21	So there is one document here that was	
22	produced in the course of the work by the engineers.	
23	All these are all the documents that were not	
24	previously produced by Google, have new Bates numbers.	
25	These are all attorneys' eyes only, have highly	09:46
!	Pag	e 5

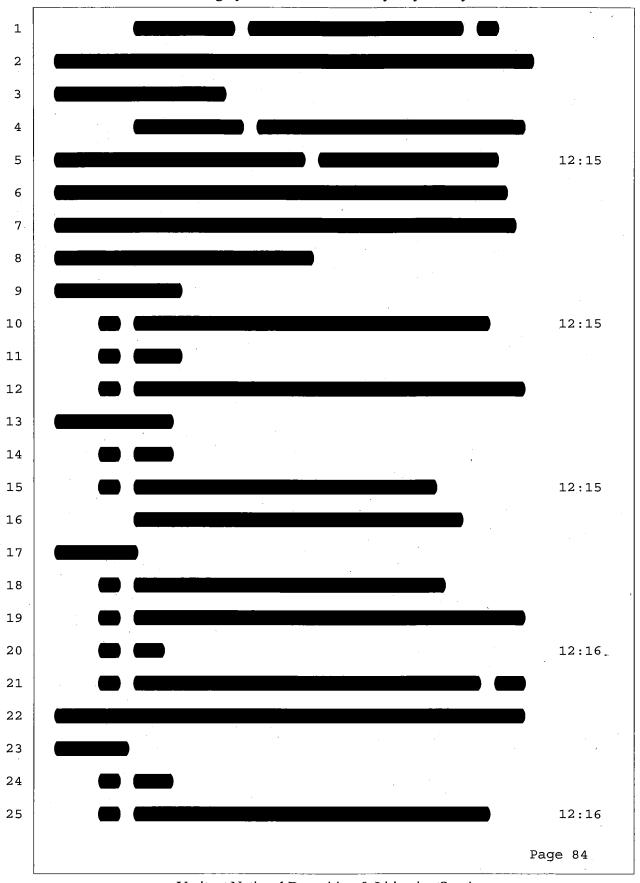
1	confidential. And we will designate the entire	
2	deposition today as attorneys' eyes only and highly	
3	confidential.	e e e e e e e e e e e e e e e e e e e
4	And I think what I just gave you may have	
5	three sets of identical documents.	9:46
6	MR. MULLEN: Three sets of the same	
7	documents?	
8	MR. NORTON: I'm sorry?	· · · · · · · · · · · · · · · · · · ·
9	(Counsel examines documents.)	
10	THE WITNESS: What did he say the date was?	9:47
11	(Discussion off the record.)	
12	MR. NORTON: Now, there is a version of a	
13	spreadsheet that was produced to Professor Cockburn	
14	for reliance in his expert report. There are, of	
15	course, earlier drafts of that Dr. Reinhold created (	9:47
16	along the way. And it's our interpretation of Rule 26	
17	and the Court's orders in this case and stipulation	
18	between the parties that the interim drafts of	
19	Dr. Reinhold's spreadsheet are not be produced, but if	
20	there's some question about that we can talk about (	9:47-
21	that. I assume you want to talk about it off the	
22	record so as not to use up your time.	·
23	MR. MULLEN: I think that's right.	,
24	MR. NORTON: Okay. So that's what I have for	
25	you.	9:48
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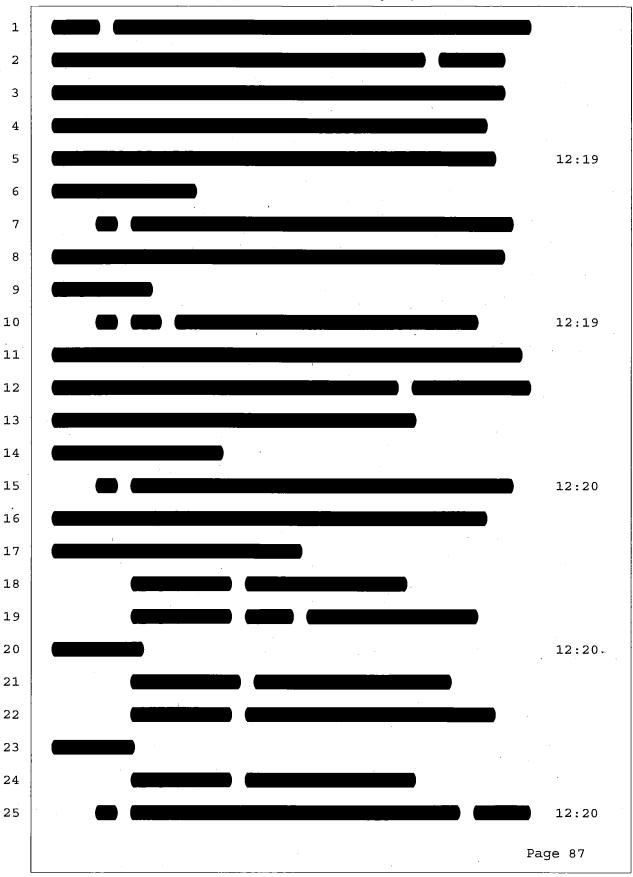
1	MR. MULLEN: Okay.	
2	EXAMINATION	
3	BY MR. MULLEN:	
4	Q. Good morning, Mr. Rose.	
5	A. Good morning.	09:48
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9		
10	Q. And have you ever been deposed before?	09:48
11	A. No.	
12	Q. Have you ever testified at trial before?	
13	A. No.	
14	Q. Ever testified under oath in any way?	
15	A. I don't think so.	09:48
16	Q. Okay. Well, I'll just go over a few basic	·
17	ground rules for the deposition. I'm sure you	
18	probably talked about this stuff with your attorney.	
19	It's pretty straightforward, but I'll be asking the	
20	questions; you'll be providing answers. It probably	09:48.
21	works best if you let me finish my question in full	
22	before you start your answer, just because the court	
23	reporter can only take down one of us; and so if you	
24	wait for me to finish my questions, I'll wait for you	
25	to finish your answers, and we should be okay there.	09:49
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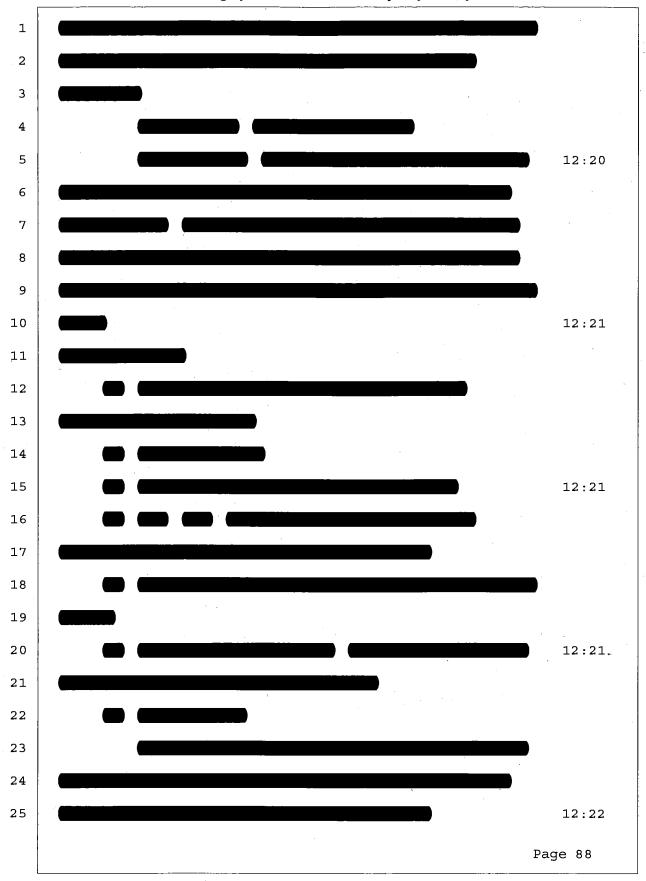
1	MR. MULLEN: I don't have the list right in
2	front of me, so let's go off the record briefly. I
3	understand we have to change the tape. We don't need
4	to take a break, but we can just change the tape and
5	get back on the record. 12:08
6	THE VIDEO OPERATOR: This marks the end of
7	Disk No. 1 to the deposition of John Rose. The time
8	is 12:11 p.m., and we are off the record.
9	(Recess taken.)
10	THE VIDEO OPERATOR: This marks the beginning 12:11
11	of Disk No. 2 to the videotaped deposition of John
12	Rose. The time is 12:15 p.m., and we are back on the
13	record.
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25	12:13
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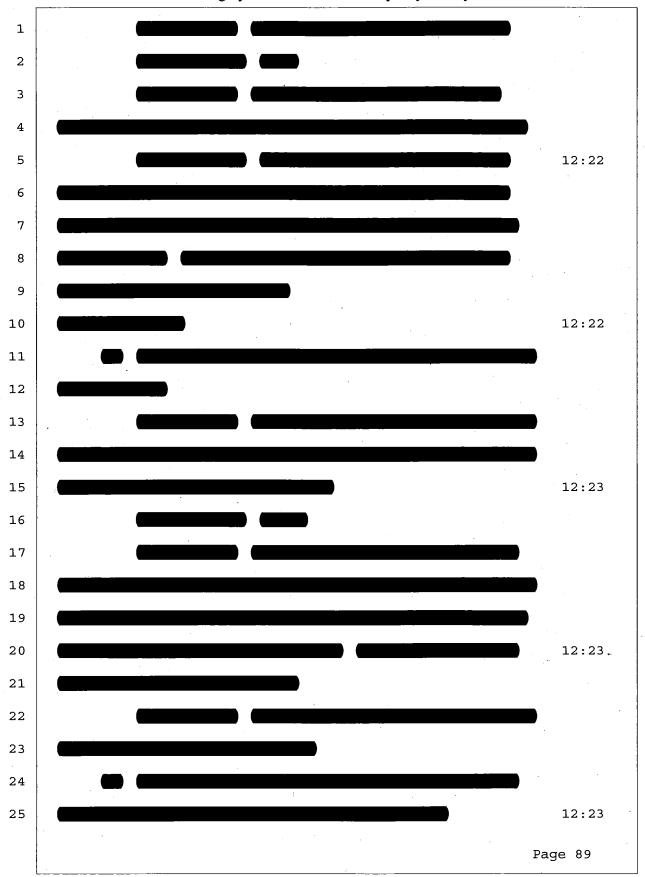


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1 STATE OF CALIFORNIA ) ss: 2 3 I, SANDRA LEE HOCKIN, C.S.R. No. 7372, do hereby certify: 4 That the foregoing deposition testimony was 5 6 taken before me at the time and place therein set 7 forth and at which time the witness was administered the oath; 8 9 That the testimony of the witness and all 10 objections made by counsel at the time of the 11 examination were recorded stenographically by me, 12 and were thereafter transcribed under my direction 13 and supervision, and that the foregoing pages 14 contain a full, true and accurate record of all 15 proceedings and testimony to the best of my skill 16 and ability. 17 I further certify that I am neither counsel for any party to said action, nor am I related to any 18 19 party to said action, nor am I in any way interested 20 in the outcome thereof. 21 IN WITNESS WHEREOF, I have subscribed my name 22 this 16th day of February, 2012. 23 24 rdra Lee Hockin 25 SANDRA LEE HOCKIN, C.S.R. No. 7372 Page 108